

NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, APPROVAL OF MANNER OF DISTRIBUTION OF NET SETTLEMENT FUND, AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND AN AWARD TO PLAINTIFFS

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Plaintiffs Student A, Chris Riotta, Lisa Guerra and Alexandra Taylor-Gutt, on behalf of the Settlement Class, through counsel, will move this Court on March 24, 2022, at 3:30 p.m., before the Honorable Jesse M. Furman, for entry of order and judgment, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) granting final approval of the proposed Settlement; (2) approving the manner of distribution of the Net Settlement Fund; (3) awarding attorneys' fees, plus expenses in the litigation; and (4) approving an award to Plaintiffs in connection with their representation of the Settlement Class. This motion is based on: (i) the Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and Approval of Manner of Distribution of Net Settlement Fund; (ii) the Memorandum of Law in Support of Motion for an Award of Attorneys' Fees and Expenses and an Award to Plaintiffs; (iii) the Joint Declaration of Roy T. Willey, IV and Thomas J. McKenna in Support of Motion for Final Approval of Class Action Settlement, Approval of Manner of Distribution of Net Settlement Fund, an Award of Attorneys' Fees and Expenses and an Award to Plaintiffs, and all other proceedings herein.

Dated: February 7, 2022

Respectfully submitted,

GAINEY McKENNA & EGLESTON

By: /s/ Thomas J. McKenna Thomas J. McKenna Gregory M. Egleston 501 Fifth Avenue, 19th Floor New York, NY 10017

Tel.: (212) 983-1300

Email: tjmckenna@gme-law.com Email: gegleston@gme-law.com

ANASTOPOULO LAW FIRM, LLC

By: /s/ Roy T. Willey, IV

Roy T. Willey, IV (admitted *pro hac* vice) Eric M. Poulin (admitted *pro hac* vice)

32 Ann Street

Charleston, SC 29403 Tel: (843) 614-8888

Email: roy@akimlawfirm.com
Email: eric@akimlawfirm.com

Co-Lead Counsel for Plaintiffs and the Putative Class

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on February 7, 2022, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such public filing to all counsel registered to receive such notice.

/s/ Thomas J. McKenna Thomas J. McKenna